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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

VISION INDUSTRIES GROUP, INC.,

Plaintiff,

Case No. 2:18-cv-6296 (ES) (CLW)

-- against --

ACU PLASMOLD, INC., ABC
COMPANIES 1-10 and XYZ
CORPORATIONS 1-10,

**DEFENDANT ACU PLASMOLD,
INC.'S RESPONSE FIRST SET OF
REQUESTS FOR ADMISSIONS**

Defendants

TO: Evelyn A. Donegan, Esq.
Rubin, Kaplan & Associates
200 Centennial Avenue
Suite 110
Piscataway, NJ 08854

RESPONSE TO REQUEST FOR ADMISSIONS

1. ACU Hardware USA has sold casement products in the United States to customers other than I.W.C. after November 10, 2015.

DENIED

2. ACU Hardware USA has sold casement products in the United States to customers other than I.W.C. after November 10, 2016.

DENIED

3. ACU Hardware USA has sold casement products in the United States to customers other than I.W.C. after November 10, 2017.

DENIED

4. ACU Hardware USA has sold casement products in the United States to customers other than I.W.C. after November 10, 2018.

DENIED

5. ACU Hardware USA has sold casement products in the United States to customers other than I.W.C. after October 1, 2019.

DENIED

6. ACU Hardware USA has sold non-casement products in the United States to customers other than I.W.C. after November 10, 2015.

ADMITTED

7. ACU Hardware USA has sold non-casement products in the United States to customers other than I.W.C. after November 10, 2016.

ADMITTED

8. ACU Hardware USA has sold non-casement products in the United States to customers other than I.W.C. after November 10, 2017.

ADMITTED

9. ACU Hardware USA has sold non-casement products in the United States to customers other than I.W.C. after November 10, 2018.

ADMITTED

10. ACU Hardware USA has sold non-casement products in the United States to customers other than I.W.C. after October 1, 2019.

ADMITTED

11. ACU Plasmold has sold casement products in the United States to customers other than I.W.C. after November 10, 2015.

DENIED

12. ACU Plasmold has sold casement products in the United States to customers other than I.W.C. after November 10, 2016.

DENIED

13. ACU Plasmold has sold casement products in the United States to customers other than I.W.C. after November 10, 2017.

DENIED

14. ACU Plasmold has sold casement products in the United States to customers other than I.W.C. after November 10, 2018.

DENIED

15. ACU Plasmold has sold casement products in the United States to customers other than I.W.C. after October 1, 2019.

DENIED

16. ACU Plasmold has sold non-casement products in the United States to customers other than I.W.C. after November 10, 2015.

ADMITTED

17. ACU Plasmold has sold non-casement products in the United States to customers other than I.W.C. after November 10, 2016.

ADMITTED

18. ACU Plasmold has sold non-casement products in the United States to customers other than I.W.C. after November 10, 2017.

ADMITTED

19. ACU Plasmold has sold non-casement products in the United States to customers other than I.W.C. after November 10, 2018.

ADMITTED

20. ACU Plasmold has sold non-casement products in the United States to customers other than I.W.C. after October 1, 2019.

ADMITTED

21. Alvin Zhou is the 70% owner of ACU Hardware USA.

ADMITTED

22. John Quach is the 30% owner of ACU Hardware USA.

ADMITTED

23. John Quach and Alvin Zhou were the only owners of ACU Hardware USA in November, 2015.

ADMITTED

24. Alvin Zhuo is the 100% owner of ACU Plasmold's China factory.

ADMITTED

25. Alvin Zhuo and Wu Ping Ling [wife] were the only owners of ACU Plasmold Canada, in November 2015.

ADMITTED

26. Alvin Zhuo and Wu Ling Ping are the only owners of ACU Plasmold Canada.

ADMITTED

27. Alvin Zhuo regular communicates in English via e-mail.

ADMITTED

28. Alvin Zhuo regular communicates in person and by telephone in English.

ADMITTED

29. After November 10, 2015, ACU Plasmold charged one of its customers a lower price than the priced charged to Vision Industries Group, Inc., for [hardware part] Elite 1 Right hand.

DENIED

30. After November 10, 2015, ACU Plasmold charged one of its customers a lower price than the price charged to Vision Industries Group, Inc., for Elite 1 Left hand.

DENIED

31. After November 10, 2015, ACU Plasmold charged one of its customers a lower price than the price charged to Vision Industries Group, Inc., for FH-.3BC-78.

DENIED

32. ACU Plasmold Canada charged one of its customers a lower price than the price charged to Vision Industries Group, Inc., for FH-03A C-78.

DENIED

33. Delivery and freight charges for imports from China into Canada is approximately 14% of the FOB China cost.

DENIED

34. ACU Plasmold's factory in China charged Vision Industries Group more than it charged other US customers for the same products purchased by Vision Industries Group.

DENIED

35. ACU Plasmold's factory in China charged Vision Industries Group more than it charged customers in Canada for the same products purchased by Vision Industries Group.

DENIED

36. ACU Plasmold sold casement products in 2015 to Mennie Canada at a price lower than the price charged to Vision Industries Group, Inc.

DENIED

37. ACU Plasmold sold casement products in 2016 to Mennie Canada at a price lower than the price charged to Vision Industries Group, Inc.

DENIED

38. ACU Plasmold sold casement products in 2017 to Mennie Canada at a price lower than the price charged to Vision Industries Group, Inc.

DENIED

39. ACU Plasmold sold casement products in 2018 to Mennie Canada at a price lower than the price charged to Vision Industries Group, Inc.

DENIED

40. ACU Plasmold sold casement products in 2019 to Mennie Canada at a price lower than the price charged to Vision Industries Group, Inc.

DENIED

41. ACU Plasmold sold non-casement products in 2015 to Mennie Canada at a price lower than the price charged to Vision Industries Group, Inc.

DENIED

42. ACU Plasmold sold non-casement products in 2016 to Mennie Canada at a price lower than the price charged to Vision Industries Group, Inc.

DENIED

43. ACU Plasmold sold non-casement products in 2017to Mennie Canada at a price lower than the price charged to Vision Industries Group, Inc.

DENIED

44. ACU Plasmold sold non-casement products in 2018 to Mennie Canada at a price lower than the price charged to Vision Industries Group, Inc.

DENIED

45. ACU Plasmold sold non-casement products in 2019 to Mennie Canada at a price lower than the price charged to Vision Industries Group, Inc.

DENIED

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Attorneys for *Defendant ACU Plasmold, Inc.*, ***TRIAL COUNSEL***

Dated: